

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: NORTHAMPTON

Magisterial District Number: 03-2-08  
MDJ: Hon. John C. Capobianco  
Address: 136 S. Main Street  
Nazareth, PA 18064

Telephone: (610)759-6424



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

JAKE  
First Name

(NAME and ADDRESS):

RICHARD  
Middle Name

TOWNE

**COPY**

120 Parker Avenue  
Easton, PA 18042

NCIC Extradition Code Type

- |  |   |  |  |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full               | <input type="checkbox"/> 5-Felony Pending Extradition         | <input type="checkbox"/> C-Misdemeanor Surrounding States        | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited            | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input checked="" type="checkbox"/> D-Misdemeanor No Extradition |  |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full                   | <input type="checkbox"/> E-Misdemeanor Pending Extradition       |  |
| <input type="checkbox"/> 4-Felony No Extradition     | <input type="checkbox"/> B-Misdemeanor Limited                | <input type="checkbox"/> F-Misdemeanor Pending Extradition       |  |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR513-19</b>	Date Filed <b>11/21/19</b>	OTN/LiveScan Number <b>0572139-4</b>	Complaint/Incident Number <b>41-251</b>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----------------------------------	-------------------------------	---	--	--

GENDER <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	DOB 09/10/1979	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic	Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink)
---	--	--

Eye Color <input type="checkbox"/> BLK (Black) <input checked="" type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)
---

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
FBI Number	MNU Number	
Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO		Ft. HEIGHT In.
Fingerprint Classification:		5 11

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507.)

SDAG NICOLE FORZATO

(Name of the attorney for the Commonwealth)

*Nicole Forzato, SDAG*  
(Signature of the attorney for the Commonwealth)

/ /  
(Date)

I, SEAN M. MCGLINN  
(Name of the Affiant)

#572

(PSP/MPOETC - Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General  
(Identify Department or Agency Represented and Political Subdivision)  
do hereby state: (check appropriate box)

PA0222400  
(Police Agency ORI Number)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe  
with violating the penal laws of the Commonwealth of Pennsylvania at [ ] Northampton  
(Subdivision Code) (Place/Political Subdivision)

in NORTHAMPTON County [48]  
(County Code)

on or about 01/01/2018 - 08/15/2018



# POLICE CRIMINAL COMPLAINT

Docket Number: <b>22513-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number <b>U773139-4</b>	Complaint/Incident Number <b>41-251</b>
Defendant Name: First: <b>JAKE</b>	Middle: <b>RICHARD</b>	Last: <b>TOWNE</b>	

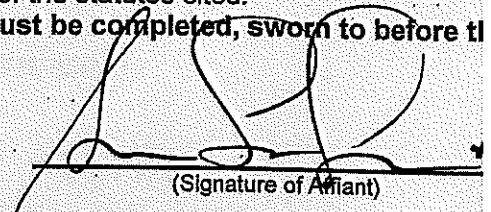
**COPY**

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through     .
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.  
**(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)**

(Date)

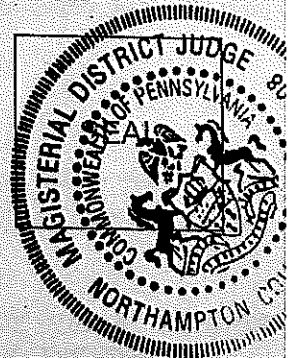
(Year)

  
 (Signature of Affiant)

AND NOW, on this date Nov. 21, 2019 I certify that the complaint has been properly completed and verified.  
 An affidavit of probable cause must be completed before a warrant can be issued.

03-2-08  
 (Magisterial District Court Number)

  
 (Issuing Authority)







# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR513-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number: <b>U772139-4</b>	Complaint/Incident Number: <b>41-251</b>
Defendant Name: <b>JAKE</b>	First: <b>JAKE</b>	Middle: <b>RICHARD</b>	Last: <b>TOWNE</b>

**COPY**

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically. (Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> 1	3513		of the	25 PA. C.S.	1	M		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of statute or ordinance): **FALSE SIGNATURES AND STATEMENTS IN NOMINATION PETITIONS**

Acts of the accused associated with this Offense: The defendant by his own conduct; did knowingly make a false statement in an affidavit required by the provisions of this act, to be appended to or to accompany a nomination paper. The defendant did sign and attest section D, Statement of Circulator Commonwealth of Pennsylvania 2018 Nomination Paper Minor Political Party, Page 1039; knowing that he did not circulate that page. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> 2	3502		of the	25 PA. C.S.	1	M1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of statute or ordinance): **PERJURY**

Acts of the accused associated with this Offense: The defendant by his own conduct; did knowingly make a willful false statement, under oath/affirmation and in writing regarding any material matter or thing relating to any subject being determined or acted upon by any county board of election or member thereof, or by any court or judge thereof, judge of election, Inspector of election, or overseer, in accordance with the terms of the Election Code. TO WIT: the defendant did sign and attest section D, Statement of Circulator of Commonwealth of Pennsylvania 2018 Nomination Paper Minor Political Party, Page 1039; knowing that he did not circulate that page. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> 3	4104	(a)	of the	18 PA C.S.A.	1	M1		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
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Statute Description (Include the name of statute or ordinance): **TAMPERING WITH RECORDS OR IDENTIFICATION**

**POLICE CRIMINAL COMPLAINT**

Docket Number: <b>CR513-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number <b>0772139-4</b>	Complaint/Incident Number <b>41-251</b>
Defendant Name:	First: <b>JAKE</b>	Middle: <b>RICHARD</b>	Last: <b>TOWNE</b>

Acts of the accused associated with this Offense: The defendant by his own conduct; did knowingly falsified a written record with the intent to deceive and conceal his wrongdoing. TO WIT: the defendant did sign and attest section D, Statement of Circulator of Commonwealth of Pennsylvania 2018 Nomination Paper Minor Political Party, Page 1039; knowing that he did not circulate that page. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> Lead?	<b>4</b>	<b>4904</b>	<b>(b)</b>	<b>of the</b>	<b>18 PA C.S.A.</b>	<b>1</b>	<b>M2</b>		
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **UNSWORN FALSIFICATION**

Acts of the accused associated with this Offense: The defendant by his own conduct; did knowingly make a written false statement which he knew not be true on a form bearing notice, authorized by law, to the effect that false statements made therein are punishable. TO WIT: the defendant did sign and attest section D, Statement of Circulator of Commonwealth of Pennsylvania 2018 Nomination Paper Minor Political Party, Page 1039; knowing that he did not circulate that page.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> Lead?	<b>5</b>	<b>4911</b>	<b>(a)(2)</b>	<b>of the</b>	<b>18 PA C.S.A.</b>	<b>1</b>	<b>M2</b>		
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **TAMPERING WITH RECORDS OR IDENTIFICATION**

Acts of the accused associated with this Offense: The defendant by his own conduct; did knowingly present and use a document, knowing it to be false and with the intent that it be taken as a genuine part of records required by law. TO WIT: the defendant did sign and attest section D, Statement of Circulator of Commonwealth of Pennsylvania 2018 Nomination Paper Minor Political Party, Page 1039; knowing that he did not circulate that page Instead he advertised on social media for a circulator and then signed his own name as the circulator.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/> Lead?				<b>of the</b>					
PennDOT Data (If applicable)	Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:



**POLICE CRIMINAL COMPLAINT**

Docket Number: <b>CR513-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number <b>U772 139-4</b>	Complaint/Incident Number <b>41-251</b>
Defendant Name: <b>JAKE</b>	First: <b>JAKE</b>	Middle: <b>RICHARD</b>	Last: <b>TOWNE</b>

**COPY****AFFIDAVIT of PROBABLE CAUSE**

Your Affiant, Sean M. McGlinn, Supervisory Special Agent, Badge 572, of the Pennsylvania Office of Attorney General, Bureau of Criminal investigations assigned to the Criminal Prosecutions Section, being duly sworn according to law, deposes and says:

Your Affiant is empowered by law to conduct investigations of and to make arrests for violations of the Pennsylvania Crimes Code and the Pennsylvania Election Code, among other things.

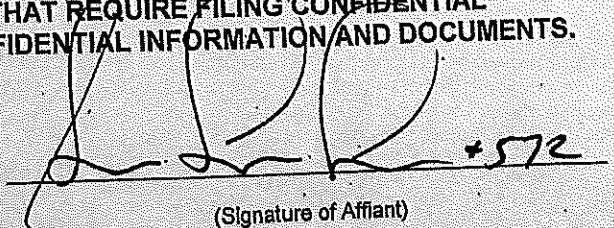
On November 5, 2019, the 44<sup>th</sup> Statewide Investigating Grand Jury Issued a Presentment known as "Amended Presentment No 1" (hereinafter: Presentment) recommending that criminal charges be filed against Jake Towne for violations of the Pennsylvania Election Code and the Pennsylvania Crimes Code. The aforementioned Presentment was accepted by the Honorable Lillian Harris Ransom, Supervising Judge of the 44<sup>th</sup> Statewide Investigating Grand Jury by Order dated November 6, 2019. A copy of the Presentment and the Order accepting the Presentment is attached hereto and incorporated herein by reference, recommends charges be filed by the Attorney General or his designee against the defendant as follows:

- Count 1: False Signatures and Statements in Nomination Petitions and Papers, 25 P.S. §3513
- Count 2: Perjury, 25 P.S. §3502
- Count 3: Tampering with Records or Identification, 18 Pa. C.S. §4104(a)
- Count 4: Unsworn Falsification to Authorities, 18 Pa. C.S. §4904 (b)
- Count 5: Tampering with Public Records or Information, 18 Pa. C.S. §4911(a)(2)

Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause. Your Affiant avers that the testimony before the 44<sup>th</sup> Statewide Investigating Grand Jury is consistent with the information contained within Presentment No. 1 and the information developed within the course of the investigation specified herein. Furthermore, Presentment No. 1 shows on its face that it is based upon evidence which the 44<sup>th</sup> Statewide Investigating Grand Jury reviewed and evaluated which included sworn testimony and physical evidence presented to it. Your Affiant has reviewed the evidence presented before the 44<sup>th</sup> Statewide Investigating Grand Jury and finds that it comports with the findings of the general investigation.

I, SEAN M. MCGLINN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

  
(Signature of Affiant)

Sworn to me and subscribed before me this 21 day of November 2019

Date



My commission expires first Monday of January, 2020

Magistrate District Judge



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF NORTHAMPTON

Magisterial District Number: 03-2-08  
MDJ: Hon. John C. Capobianco  
Address: 136 S. Main Street  
Nazareth, PA 18064

Telephone: (610)759-6424



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

AMBER

First Name

159 Wood Street  
Nazareth, PA 18064

(NAME and ADDRESS):

NICOLE

Middle Name

CORRELL

**COPY**

Gen

NCIC Extradition Code Type

- |  |   |  |  |
|--|---|--|--|
| <input type="checkbox"/> 1-Felony Full               | <input type="checkbox"/> 5-Felony Pending Extradition         | <input type="checkbox"/> C-Misdemeanor Surrounding States  | <input type="checkbox"/> Distance: _____ |
| <input type="checkbox"/> 2-Felony Limited            | <input type="checkbox"/> 6-Felony Pending Extradition Determ. | <input type="checkbox"/> D-Misdemeanor No Extradition      |  |
| <input type="checkbox"/> 3-Felony Surrounding States | <input type="checkbox"/> A-Misdemeanor Full                   | <input type="checkbox"/> E-Misdemeanor Pending Extradition |  |
| <input type="checkbox"/> 4-Felony No Extradition     | <input type="checkbox"/> B-Misdemeanor Limited                | <input type="checkbox"/> F-Misdemeanor Pending Extradition |  |

DEFENDANT IDENTIFICATION INFORMATION

Docket Number <b>CR512-19</b>	Date Filed <b>11/21/19</b>	OTN/LiveScan Number <b>U772129-1</b>	Complaint/Incident Number <b>41-251</b>	Request Lab Services? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
----------------------------------	-------------------------------	---	--	--

GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB <b>08/12/1980</b>	POB	Add'l DOB <b>/ /</b>	Co-Defendant(s) <input type="checkbox"/>
First Name	Middle Name	Last Name	Gen.	
AKA				

RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input checked="" type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown	HAIR <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)
---	--	--

Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> MAR (Maroon) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> XXX (Unknown)
---

DNA <input type="checkbox"/> YES <input type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)
---	--------------	---------------

FBI Number	MNU Number
------------	------------

Defendant Fingerprinted <input type="checkbox"/> YES <input type="checkbox"/> NO	FL HEIGHT (in.)
---	-----------------

Fingerprint Classification:	5	2
-----------------------------	---	---

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R. Crim.P. 507).

SDAG NICOLE FORZATO

(Name of the attorney for the Commonwealth)

*Nicole Forzato* SDAG

(Signature of the attorney for the Commonwealth)

(Date)

I, SEAN M. MCGLINN

(Name of the Affiant)

#572

(PSP/MPOETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [ ] Northampton  
(Subdivision Code) (Place/Political Subdivision)

in NORTHAMPTON County [48]

(County Code)

on or about 07/01/18 - 08/05/18





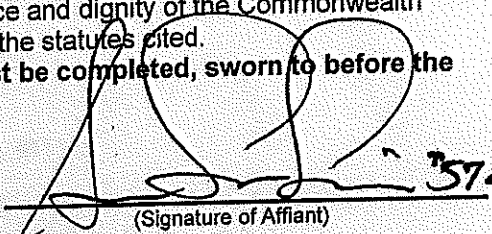
# POLICE CRIMINAL COMPLAINT

Docket Number: <b>03-2-08</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number: <b>0772129-1</b>	Complaint/Incident Number: <b>41-251</b>
Defendant Name:	First: <b>AMBER</b>	Middle: <b>NICOLE</b>	Last: <b>CORRELL</b>

**COPY**

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered 1 through    .
5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.  
**(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)**

  
(Signature of Affiant) **572**

(Date)

(Year)

AND NOW, on this date

**NOV. 21, 2019**

I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

**03-2-08**

(Magisterial District Court Number)

  
(Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number: <b>CR512-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number <b>0772129-1</b>	Complaint/Incident Number <b>41-251</b>
Defendant Name:	First: <b>AMBER</b>	Middle: <b>NICOLE</b>	Last: <b>CORRELL</b>

**COPY**

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.  
(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>5</b>
--	---	--	--	--

<input type="checkbox"/>	<b>1</b>	<b>4101</b>	<b>(a)(2)</b>	<b>on the</b>	<b>18 PA. C.S.</b>	<b>25</b>	<b>M1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number: _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	------------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: The defendant by her own conduct: did knowingly execute a writing so that it purported to be the act of another, that other person did not authorize the writing and she acted with the intent to defraud another person. TO WIT: the defendant did forge the signature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older <b>5</b>
--	---	--	--	--

<input type="checkbox"/>	<b>2</b>	<b>4120</b>	<b>(a)</b>	<b>on the</b>	<b>18 PA. CS.</b>	<b>25</b>	<b>M1</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number: _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	------------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **IDENTITY THEFT**

Acts of the accused associated with this Offense: The defendant by her own conduct: did use the identifying information of another person, without their consent to further an unlawful purpose. TO WIT: the defendant did forge the signature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

<input checked="" type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
--	---	--	--	---

<input type="checkbox"/>	<b>3</b>	<b>3513</b>		<b>on the</b>	<b>25 PA. CS.</b>	<b>25</b>	<b>M</b>		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code

PennDOT Data (if applicable)	Accident Number: _____	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	------------------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (include the name of statute or ordinance): **FALSE SIGNATURES AND STATEMENTS IN NOMINATION PETITIONS**





# POLICE CRIMINAL COMPLAINT

Packet Number: <b>CR512-19</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number: <b>U772129-1</b>	Complaint/Incident Number: <b>41-251</b>
Defendant Name:	First: <b>AMBER</b>	Middle: <b>NICOLE</b>	Last: <b>CORRELL</b>

**COPY**

Acts of the accused associated with this Offense: The defendant by her own conduct; did fraudulently sign any name not her own to a nomination paper. TO WIT: the defendant did forge the signature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	4104	(a)	on the	18 PA C.S.A.	25	M1		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **TAMPERING WITH RECORDS OR IDENTIFICATION**

Acts of the accused associated with this Offense: The defendant by her own conduct; did knowingly falsify a written record with the intent to deceive. TO WIT: the defendant did forge the signature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	4911	(a)(1)	on the	18 PA C.S.A.	1	M2		
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **TAMPERING WITH PUBLIC RECORDS OR INFORMATION**

Acts of the accused associated with this Offense: The defendant by her own conduct; did knowingly make a false entry of a document received by the government for information or record. TO WIT: the defendant did forge the signature of twenty-five people, without their consent, on a Commonwealth of Pennsylvania 2018 Nomination Paper, Minor Political Party, Page 1039. That Nomination Paper was then submitted to the Pennsylvania Department of State as a true document.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
------------------	---	--	--	---

<input type="checkbox"/>				on the					
Lead?	Offense#	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance):

Acts of the accused associated with this Offense:

Docket Number: <b>CR512-1A</b>	Date Filed: <b>11/21/19</b>	OTN/LiveScan Number <b>U772229-1</b>	Complaint/Incident Number <b>41-251</b>
Defendant Name:	First: <b>AMBER</b>	Middle: <b>NICOLE</b>	Last: <b>CORRELL</b>

**COPY**

## AFFIDAVIT of PROBABLE CAUSE

Your Affiant, Sean M. McGlinn, Supervisory Special Agent, Badge 572, of the Pennsylvania Office of Attorney General, Bureau of Criminal Investigations assigned to the Criminal Prosecutions Section, being duly sworn according to law, deposes and says:

Your Affiant is empowered by law to conduct investigations of and to make arrests for violations of the Pennsylvania Crimes Code and the Pennsylvania Election Code, among other things.

On November 5, 2019, the 44<sup>th</sup> Statewide Investigating Grand Jury issued a Presentment known as "Amended Presentment No 1" (hereinafter: Presentment) recommending that criminal charges be filed against Amber Correll for violations of the Pennsylvania Election Code and the Pennsylvania Crimes Code. The aforementioned Presentment was accepted by the Honorable Lillian Harris Ransom, Supervising Judge of the 44<sup>th</sup> Statewide Investigating Grand Jury by Order dated November 6, 2019. A copy of the Presentment and the Order accepting the Presentment is attached hereto and incorporated herein by reference, recommends charges be filed by the Attorney General or his designee against the defendant as follows:

Count 1: Forgery, 18 Pa. C.S. §4101(a)(2)

Count 2: Identity Theft, 18 Pa. C.S. §4120(a)

Count 3: False Signatures and Statements in Nomination Petitions and Papers, 25 P.S. §3513

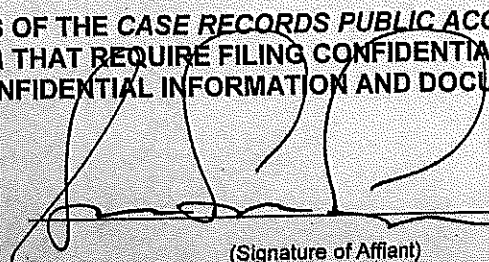
Count 4: Tampering with Records or Identification, 18 Pa. C.S. §4104(a)

Count 5: Tampering with Public Records or Information, 18 Pa. C.S. §4911(a)(1)

Having read and reviewed the Presentment, and after having participated in this investigation and considering all the facts and circumstances, your Affiant is adopting the Presentment and incorporating it fully into this Affidavit of Probable Cause. Your Affiant avers that the testimony before the 44<sup>th</sup> Statewide Investigating Grand Jury is consistent with the information contained within Presentment No. 1 and the information developed within the course of the investigation specified herein. Furthermore, Presentment No. 1 shows on its face that it is based upon evidence which the 44<sup>th</sup> Statewide Investigating Grand Jury reviewed and evaluated which included sworn testimony and physical evidence presented to it. Your Affiant has reviewed the evidence presented before the 44<sup>th</sup> Statewide Investigating Grand Jury and finds that it comports with the findings of the general investigation.

I, SEAN M. MCGLINN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

 \*572  
(Signature of Affiant)

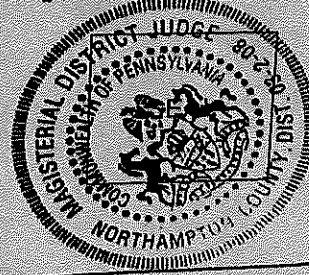
Sworn to me and subscribed before me this 21 day of November 2019

Date



, Magisterial District Judge

My commission expires first Monday of January, 2020





## INTRODUCTION

We, the members of the Forty-Fourth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code and Election Code occurring in Northampton County pursuant to Notice of Submission of Investigation Number 28, do hereby make the following findings of fact and recommendation of charges:

## FINDINGS OF FACT

The Grand Jury conducted an investigation into fraudulent activity associated with the 2018 nomination paperwork for Libertarian Party candidates seeking public office. Special Agent Sean McGlinn ("SA McGlinn") of the Pennsylvania Office of Attorney General ("OAG") appeared before the Grand Jury and testified that the matter was brought to the attention of the OAG in August 2018 via a letter advising that the nomination papers filed with the Pennsylvania Department of State ("DOS") on July 27, 2018 and August 1, 2018 contained forged signatures and other irregularities. The correspondence included two notarized affidavits by C.M. and E.F., two female registered voters who resided in the 7<sup>th</sup> Congressional District in Northampton County. Each affidavit advised that the signature affixed to the corresponding nomination paper was not the signature of the purported signer, and that neither gave anyone authorization to sign the nomination papers in her stead.

The Grand Jury learned that for third party candidates seeking elected positions such as Governor, Lieutenant Governor, Senator, Congressperson, and/or a member of the Pennsylvania General Assembly to obtain ballot access for the 2018 general election, the candidates were required to file their nomination papers signed by "qualified electors" with the DOS by August 1, 2018. Each qualified elector was required to sign and print his or her name and provide his or her home address. Each elector was further required to list the date on which he or she signed the

document. In order to be eligible for ballot access, third party candidates needed to collect a certain number of signatures from qualified electors. The number of required signatures was determined by the particular position that was sought. Candidates submitting nomination papers containing less than the requisite number of signatures were not eligible to be on the ballot.

The Grand Jury heard testimony indicating that OAG agents interviewed C.M. and E.F. Specifically, the Grand Jury learned that after reviewing the nomination paper identified as "page 243" and filed with DOS on July 27, 2018, C.M. advised that she did, in fact, sign the document. E.F., however, confirmed that she did not sign the nomination paper identified as "page 1039" and filed with DOS on August 1, 2018.

The Grand Jury learned that there were a total of 25 signatures on "page 1039" and that 23 of those individuals were located and interviewed by OAG agents. A redacted copy of "page 1039" is set forth immediately below. Notably, even with just a glance the appearance of "page 1039" reveals striking similarities in the handwriting contained therein.



**OFFICIAL USE ONLY**

## A. PREAMBLE

We, the undersigned, all of whom are qualified electors of Pennsylvania, of the County of \_\_\_\_\_, and of the electoral district designated below, hereby nominate the persons designated in "A" below as candidates to represent the minor political party named below.

#### B. CANDIDATE INFORMATION

OFFICIAL TITLE	DISTRICT	NAME OF CANDIDATE	Home No.	Office No.	City, State & Zip	OCCUPATION
United States Senator	Alabama	Orlando B. Kelly, Jr.	808	Duncan Dr.	Huntsville, Ala.	Project Manager
Governor	Alabama	Kenneth V. Ragsdale	117	West Ave.	Albany, Ga.	Business Architect
United States Congressman	Alabama	Kathleen B. Ryan	240	W. Park Pl.	Cincinnati, Ohio	Radio & Film Manager
Representative in Congress	?	Tim Dillies	205	Baba Vista Dr.	Huntsville, Ala.	Television Director
Mayor of the District of Columbia	?	Paul Rizzo	3880	Blossing Lane	Richland, S.C.	General Electric Division
Director of the Federal Bureau of Investigation	?	Ed Keenan	1181	Fairview	Yonkers, N.Y.	Consultant

SIGNATURE OF ELECTOR	PRINTED NAME OF ELECTOR	PLACE OF RESIDENCE			DATE OF RESIDENCE
		House No.	Street or Lane	City, Town or Twp.	
1. [Signature]		1404 St.	Albany	Albany	7/1/18
2. [Signature]		1404 St.	Albany	Albany	7/1/18
3. [Signature]		1404 St.	Albany	Albany	7/1/18
4. [Signature]		1404 St.	Albany	Albany	7/1/18
5. [Signature]		1404 St.	Albany	Albany	7/1/18
6. [Signature]		1404 St.	Albany	Albany	7/1/18
7. [Signature]		1404 St.	Albany	Albany	7/1/18
8. [Signature]		1404 St.	Albany	Albany	7/1/18
9. [Signature]		1404 St.	Albany	Albany	7/1/18
10. [Signature]		1404 St.	Albany	Albany	7/1/18
11. [Signature]		1404 St.	Albany	Albany	7/1/18
12. [Signature]		1404 St.	Albany	Albany	7/1/18
13. [Signature]		1404 St.	Albany	Albany	7/1/18
14. [Signature]		1404 St.	Albany	Albany	7/1/18
15. [Signature]		1404 St.	Albany	Albany	7/1/18
16. [Signature]		1404 St.	Albany	Albany	7/1/18
17. [Signature]		1404 St.	Albany	Albany	7/1/18
18. [Signature]		1404 St.	Albany	Albany	7/1/18
19. [Signature]		1404 St.	Albany	Albany	7/1/18
20. [Signature]		1404 St.	Albany	Albany	7/1/18
21. [Signature]		1404 St.	Albany	Albany	7/1/18
22. [Signature]		1404 St.	Albany	Albany	7/1/18
23. [Signature]		1404 St.	Albany	Albany	7/1/18
24. [Signature]		1404 St.	Albany	Albany	7/1/18
25. [Signature]		1404 St.	Albany	Albany	7/1/18
26. [Signature]		1404 St.	Albany	Albany	7/1/18
27. [Signature]		1404 St.	Albany	Albany	7/1/18
28. [Signature]		1404 St.	Albany	Albany	7/1/18
29. [Signature]		1404 St.	Albany	Albany	7/1/18
30. [Signature]		1404 St.	Albany	Albany	7/1/18

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### C. SIGNATURES OF ELECTORS

SIGNATURE OF ELECTOR	PRINTED NAME OF ELECTOR	PLACE OF RESIDENCE			DATE OF SIGNING
		House No.	Street or Road	City, Town or Twp.	
26.					
27.					
28.					
29.					
30.					
31.					
32.					
33.					
34.					
35.					
36.					
37.					
38.					
39.					
40.					
41.					
42.					
43.					
44.					
45.					
46.					
47.					
48.					
49.					
50.					

### D. STATEMENT OF CIRCULATOR

I state that my residence is as set forth below; that the signers to the foregoing nomination paper signed the same with full knowledge of the contents thereof; that their residences are correctly stated therein; that they all reside in the county specified below; that each signed on the date set opposite his or her name; and that to the best of my knowledge and belief, the signers are qualified electors of the electoral district designated in this nomination paper.

By signing below, I agree to submit to the jurisdiction of the Commonwealth of Pennsylvania, regarding any base or compensation payable out of my services with circulating papers, which shall be governed by the laws of the Commonwealth of Pennsylvania.

Northampton County  
County of Paper Signers Residence

Jack Towne  
Printed Name of Circulator

I state that I am the personation I represent myself to be herein, and I state that the information set forth in this section is true and accurate and made subject to the criminal penalties imposed by law for violation of 18 Pa.C.S. § 4954 (relating to unlawful falsification to automobiles).

Signature: Jack Towne DATE: 07/29/18  
MAY/DOY

Address of Circulator: 4640 Fir Drive  
Number Street  
Lower Nazareth Pennsylvania 18064  
City, Town or Twp. State Zip Code

NOTE: THIS STATEMENT MUST BE COMPLETED AFTER ALL SIGNATURES HAVE BEEN OBTAINED.



Each of the 23 individuals viewed his or her purported signature on "page 1039" and each person advised that they did not sign the document. Further, the Grand Jury heard testimony that each of the 23 individuals confirmed to OAG agents that he or she did not give anyone else permission to sign the nomination paper on his or her behalf. Moreover, the Grand Jury learned that two of the 23 individuals who were interviewed also noticed signatures on "page 1039" purporting to be the signatures of their spouses. They confirmed that the purported signatures of their spouses were forged, as well. As such, the Grand Jury learned that not one signature purporting to be that of a qualified elector supporting ballot access on "page 1039" was real or authorized.

Agent McGlinn testified that through the course of his continued investigation, he learned that Jake Towne ("Towne") signed as the nomination paper circulator for 35 separate pages, including "page 1039." Through his signature in Section D of "page 1039," he swore that all of the information contained in the document was true and that the signors were qualified electors. The evidence further revealed that Towne had been a Libertarian party candidate for public office in 2010, 2017 and 2018 and, in fact, was the elected auditor of Lower Nazareth Township in 2017. The Grand Jury learned that Towne had worked his way up through the ranks of the Northampton County Libertarian party. He served as the county party's treasurer and secretary and is currently now the president. Through a combination of his own experience in seeking public office, as well as his years of service to the party, he had extensive experience in obtaining ballot access. However, the investigation revealed that Towne did not actually circulate all of the nomination papers which he signed and attested to as the circulator.

Instead, the investigation revealed that Towne advertised on Facebook that he sought circulators for nomination papers for Libertarian candidates and offered to pay for the signatures

collected. The Grand Jury learned that it is not illegal to pay people to circulate nomination papers on behalf of candidates. However, the individual who actually obtains the signatures from qualified electors must sign as the circulator on the particular nomination paper(s). Agent McGlinn testified that Towne posted on a Facebook platform seeking assistance in obtaining signatures in July 2018. The Grand Jury learned that people affirmatively responded to his request for assistance.

The Grand Jury heard testimony that Amber Correll ("Correll") volunteered to obtain signatures in return for payment from Towne. Correll completed "page 1039" and submitted it to Towne. She advised that he instructed her not to sign the back of the document. She also advised that she was paid \$2.00 per signature and she did not tell Towne or anyone else that she forged the names, signatures and personal information. She admitted to Agent McGlinn that she did not have permission from the individuals to use their identities in this matter.

Agent McGlinn testified that through the course of the investigation, he learned from Ed Reagan that on May 8, 2019 Towne told him [Reagan] that he had paid a woman to collect the signatures on "page 1039" and that the signatures were valid but all of the other information was written in her handwriting. Thus, he acknowledged that he [Towne] did not, in fact, circulate the document.

The Grand Jury learned that C.R. saw the request for assistance through Facebook and, on July 14, 2018, she advised Towne that she was interested in obtaining signatures for him for \$2.00 per signature. She obtained blank nomination papers from him thereafter. She returned the completed nomination paper identified as "page 958" to him on or about July 26, 2018. She did not fill out the circulator's statement on the back of "page 958," however. Then, on Sunday, July



29, 2018 at 7:43 a.m., Towne contacted C.R. again to ask if she had other signatures for him. He advised through a text message:

We are so close to getting Ed [Reagan, a candidate for State Representative] on the ballot- was just checking in to see if you were collecting any in the Bangor/East Bangor/Roseto/ Nazareth boro/Stockertown/Tatamy area, they will be driven to Harrisburg either Wednesday or Tuesday so would need them by Monday evening -- will up the pay to \$2.50 per signature in the above area, ones from elsewhere in Northampton I'll pay whatever was in our contract. If you don't plan to collect, that ok (sic) too but please let me know this. It's going to be close. Thanks!! Jake'

The Grand Jury learned that C.R. did obtain three additional signatures which are located on "page 1040." Towne was not present when she obtained any of the signatures. For unknown reasons, C.R. did not sign the statement of the circulator on either page. The records clearly show that Towne filled out both.

Agent McGlinn testified that the OAG engaged Khody Detwiler ("Detwiler"), Forensic Document Examiner, to conduct an analysis of the signatures on "page 1039." Detwiler was provided with copies of the Pennsylvania driver's license signatures and voter registration card signatures for all 25 of the individuals listed on "page 1039." He was also provided handwriting exemplars from 17 of the 25 individuals. He advised to a reasonable degree of professional certainty that all 25 signatures were forged.

Detwiler was also provided handwriting exemplars from Towne, Correll and a few other individuals. He concluded to a reasonable degree of professional certainty that Correll signed the names of 12 of the 25 individuals. He further opined that it is probable that she also signed three additional names on the page; however, he could not say to a degree of professional certainty that she signed the names of the other 10 individuals. Detwiler opined that Correll wrote the bulk of the questioned handwritten text on "page 1039." Further, Detwiler advised that Towne did sign

pages 958, 1039 and 1040 in section D as the "Statement of Circulator" despite the fact that the evidence established that he never circulated those pages.

As previously stated, the Grand Jury heard evidence that nomination papers are filed with the DOS and the information contained therein is relied upon by DOS in order to give qualified individuals ballot access for the general elections in Pennsylvania. Accordingly, using the signature and identifying information of 25 individuals without their consent and for payment in order to help a candidate obtain ballot access in Pennsylvania was unlawful.